

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC. and
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No. 1:21-cv-11558-LTS

**AMERICAN AIRLINES GROUP INC. AND JETBLUE AIRWAYS CORPORATION’S
UNOPPOSED MOTION TO SEAL CONFIDENTIAL INFORMATION
IN DEFENDANTS’ PRETRIAL BRIEF**

Defendants American Airlines Group Inc. and JetBlue Airways Corporation (collectively, “Defendants”), respectfully move the Court under Local Rule 7.2 and the Stipulated Protective Order (Dkt. No. 99) for an order placing under seal limited portions of their Pretrial Brief. Pursuant to Local Rule 7.2, Defendants further request that the sealed portions of the Pretrial Brief remain impounded until further order of the court.

The Pretrial Brief contains information that third parties Alaska Airlines, Inc., Delta Air Lines, Inc., Southwest Airlines Co., and United Airlines, Inc., have designated as Confidential or Highly Confidential under the terms of the Stipulated Protected Order entered in this case. ECF No. 99. The Stipulated Protected Order requires Defendants to seal any such information that a third party has designated as Confidential or Highly Confidential when it is filed on the public docket. *See id.* ¶ 17.

Defendants’ request for sealing is narrowly tailored. Defendants seek only to seal the excerpts from the Pretrial Brief that discuss and reference this third-party information. This

ensures that detailed third-party information will remain confidential and protects the respective third parties' commercial interests while permitting the public to have the fullest possible access to the Pretrial Brief.

Accordingly, and pursuant to the Stipulated Protective Order, Defendants respectfully request that the Court seal limited portions of Defendants' Pretrial Brief to protect this information designated Confidential or Highly Confidential by third parties. Defendants are concurrently filing a redacted version of their Pretrial Brief on the public docket, where only the confidential material has been removed.

Defendants have met and conferred with Plaintiffs as required by Local Rule 7.1, and Plaintiffs do not oppose this motion.

Dated: September 9, 2022

Respectfully submitted,

/s/ Daniel M. Wall

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, Defendants have met and conferred with Plaintiffs, and Plaintiffs do not oppose this motion.

/s/ Daniel M. Wall
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing.

/s/ Daniel M. Wall
Daniel M. Wall